

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ROBERT JOSEPH MCMANUS, :  
: Plaintiff, : Civil Action No.: 21-cv-02285  
v. :  
: WALGREENS COMPANY, et al., :  
: Defendants. :

**SUBMISSION BY BILCO'S COUNSEL PURSUANT TO COURT ORDER**

1. As ordered by the Court dated May 12, 2022, I have no communications leading up to, and including the decision by Jody DeMarco to visit the site on May 2, 2022, the scheduling of the May 2<sup>nd</sup> visit, or any emails regarding the visit that came afterward.

2. Defendant The Bilco Company and Defendant Walgreens are parties to a Joint Defense Agreement relating to the above captioned litigation.

3. Bilco and Walgreens agreed to share in the cost of certain experts for the defense of this matter.

4. Bilco retained a mechanical engineer, Eugenia Kennedy, a principal of Exponent, to conduct an investigation, prepare a report, and testify in this matter. Walgreens did not share in the cost of, or the preparation of Ms. Kennedy's report or testimony.

5. Upon information and belief, Walgreens separately retained an engineer, Jodi DeMarco, to conduct an investigation, prepare a report and testify in this matter.

Dated: May 16, 2022

Respectfully submitted,

COZEN O'CONNOR

By: /s/ Michelle Michelson, Esq.

Michelle Michelson, Esq. Attorney ID No. 320852

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 16, 2021, a copy of the foregoing Michelle Michelson Submission Pursuant to Court Order was served upon the following counsel via email on May 16, 2022 addressed as follows:

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